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Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the matter of

Administration of the  
North American Numbering Plan

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CC Docket No. 92-237  
Phases One and Two

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Comments

Telaccess submits its Comments on the Commission's Notice of Proposed Rulemaking ("Notice") in the proceeding captioned above.

Introduction

Telaccess has been involved with various industry forums on matters related to numbering. Telaccess aspires to deploy a new service under access code \*\*. The nature of this STAR STAR<sup>tm</sup> (1) service is proprietary and does not exist today in WZ1. Telaccess supports the Commission's perspective that access to numbering resources is an essential requirement of promoting new services and economic growth. Most comments in this document are the result of real events and situations and therefore should provide the Commission with an inside look into the industry as it stands today in terms of numbering matters. Some of these events will be briefly discussed later in this document. Numbering today is light years away from promoting economic growth. Therefore, by pointing out specifically what does not work, the Commission will be able to make better informed decisions. Entities can always promise to deliver fair and equitable processes thru forums but what is most telling is what they actually do. Without accountability, the Commission will see more of the past repeating itself in the future, endangering it's goal of new services and economic growth.

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(1)STAR STAR<sup>tm</sup> is a trademark of Telaccess

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Telaccess supports the Commission's highest direct level of involvement with both numbering administration and policy. The more it detaches itself from numbering, the less it will be able to meet its objectives of new services and economic growth. In the summer of 1993, former Commission Chairman Sikes said that regulators would soon be overwhelmed by technological changes and would have difficulty keeping up. This will be particularly true if the Commission delegates numbering administration. The Commission should define what it needs monetarily to deal not only with numbering alone but with every technology under its jurisdiction. It should expeditiously design and implement a method to recover its monetary needs and proceed to become the most innovative and forward thinking regulatory body of our modern world. The more direct involvement the Commission chooses, the more of its goals it will fulfill.

#### Discussion

A single non government administrator overseen by the Commission and other regulators will impair and frustrate rapid innovation

The Commission has jurisdiction over numbering issues and it should secure the necessary monetary means to directly manage the WZ1 resources. Endless debates all over North America over abbreviated dialing for example have mostly wasted precious resources. The Commission should take an immediate assertive leadership role where other regulators will have an opportunity to comment and participate. An already existing patchwork of inconsistent regional decisions over dialing patterns and abbreviated dialing are already slowing the deployment of some new services. For example, NANPA has not enforced consistency of abbreviated dialing codes between wireline and cellular services. Not every entity stands to be happy with the Commission's decisions but many entities are likely to suffer as a result of decentralized and delayed decision making. A new board will take time to identify and put to work. On the other hand, the Commission can be at work before the end of 1994, promoting the interests of ratepayers. If the Commission takes center stage now, this country stands to lead in Telecommunications before the end of this decade. In countries such as Thailand, the regulators are at the center of decision making and require that providers pay the country a percentage of revenues stemming from new services. Without going that far, the Commission must step forward and lead.

Again, the Commission should seek not only fees for numbering administration but actually aim at a much broader funding base. Because the television, telephone and computers are merging, it must seek adequate funds to move effectively with these new technologies. With pennies per capita, this can be done. Less than 10 years ago, consumers paid twice as much for long distance services. What the Commission decides to collect today, the consumers will get back in savings promptly thru the promotion of new and competitive services. We must decide what we need to get the job done successfully and collect it without burdening any particular group excessively.

Financing of international WZ1 numbering administration thru levying number charges in each member country is a financially and philosophically sound goal.

This will facilitate innovation by bringing parties together and helping the development of cohesive policies inside WZ1. Giving countries a voice will help reduce the possibility that they perceive the U.S. as a player imposing decisions which affect their ratepayer base.

ATIS or a component of ATIS would not be any more an impartial body than NECA would be when it comes to numbering administration.

The Commission should abandon any desire to "oversee" any given organization and step in as the leader who will be counted on to decide on matters expeditiously.. Much like it manages spectrum and even soon plans to auction some segments, it should directly administer numbering. While the Commission mentions that ATIS now represents a more diverse group of members within the industry, this does guarantee either fair and or timely decisions compatible with growth in new services and economic growth.

I will later specifically relate ATIS to actions and events I find incompatible with fair administration on our numbering resources. Since the Commission can now get the necessary funds to perform its responsibilities, there is no need to look to anything outside the Commission on matters of such importance as numbering.

The new administrator should begin *no later* than 6 months after January 1995.

The Commission must commit now to summer 1995, a year from now as the beginning of a new exciting era. There is nothing that INPAs can seriously endanger. We may be dealing with anxiety connected to change rather than any serious risks. Because in many respects numbering policy is already lagging technology, entertaining any longer time frames will be a disservice to the marketplace. The Commission should target January 1995 as the date it begins taking over numbering administration from Bellcore.

The Commission can best administer numbering and should consult forums on technical matters to assist its decision making.

Even in some of the most complex matters, the Commission can query industry forums and receive the information it needs to make decisions in 6 months or less. The ILC has just spent over 2 years on abbreviated dialing with little value and concrete results to the ratepayers. Later in this document I intend to show actual examples of how forums have a way of manipulating information and facts to inhibit progress and the deployment of new services.

The Commission should order when needed industry forums to provide technical information on specific matters if necessary when making a numbering decision. Comments solicited by the Commission from private companies or voluntarily provided by such companies should be done under oath. Claims that only the affected players can understand these technical aspects is untrue and only serves entities who want to restrict and delay new service deployment. These forum working papers could be followed with at the maximum a 3 month period of meeting(s) to help the Commission sort the facts contained in submitted papers. Decisions should be issued no later than a month after this maximum 9 month time frame.

It should be added that anticompetitive activities in current forums is very real and that consensus by LEC dominated forums too often leads to results against the interests of ESPs and ratepayers.

The Commission will have fewer disputes to resolve if it takes leadership in numbering administration

Fragmenting the process of numbering administration all over the place is no longer in the interest of ratepayers or time. The Commission needs to handle disputes and reinforce a perception that there is ONE point of control where matters are dealt with quickly. This will promote a process where players concentrate on getting things done rather than impairing the work of competitors. I will document later why forums like the INC are not likely to best promote vigorous growth in new services. Any board the Commission creates should be composed of Commission members, not a collection of representatives cloning what forums represent today. Bringing industry players into this board will create more of what already has not worked at the INC and IILC. Mediation and arbitration should be encouraged to resolve conflicts and should be made binding on the parties involved.

The Commission should collect revenues based on uses of numbering resources and enroll other WZ1 countries into this process at the earliest possible date.

The sooner the Commission can receive a revenue stream, the better the interests of ratepayers will be served. The Commission should institute this process now to fund U.S. needs without waiting for all WZ1 countries to agree to join. The Commission should begin collecting immediately from surplus funds and surcharges while it sets up new numbering related means of funding.

The Commission should immediately order LECs to develop local number portability by January 1996.

The sooner we have local competition, the sooner large players will be motivated to cooperate with providers of new services. They will realize that Enhanced Service Providers stand to become some of their largest customers and will be willing to provide the required services or see them go to the competition. In the meantime, all companies who wish to offer local services should be allowed to do so with new overlay area codes. Many consumers may be willing to switch provider if they can retain their phone number under a new area code. Early

robust competition will dissolve conflicts before they even become disputes the Commission has to deal with. Three or four local competitors would have a way of helping deploying a STAR STARtm service in a very short time. We need to separate the number from a fixed provider. This could begin today with abbreviated numbering and the Commission should do so immediately.

Why the Commission should not delegate any administrative functions when it comes to numbering to industry players.

Telaccess has had a disastrous experience with NANPA and industry forums. Only a few of those events will be documented in this proceeding in hope that the Commission will see how it's goal for new services and economic growth will simply not materialize under such conditions. Telaccess began requesting a numbering resource over 3 years ago under The Print Group Inc. entity. Here are some examples of steps taken and results created.

-Request for \*\* was made in 1991 to NANPA who's administrator suggested that the ICCF forum be contacted to begin the process.(seeAppendix page 1:showing page 2 of administrator's response)

-Request was made to begin work on \*\* during the following agenda setting conference call of the ICCF. Curiously, the same administrator opposed any \*\* issue to be brought up at the next ICCF meeting.

-ICCF ultimately accepted to hear \*\* issue at it's July 1992 meeting but "tabled" the issue once accepted on the basis that an ILIC issue related to \*\* should first be completed. This was not justified and was merely a delaying tactic. Notes of that session are in (Appendix p.2 & 3)

-The ICCF was asked at the fall of 1992 meeting to immediately untable the \*\* issue because requestor had found technical means of deploying new service with existing network technologies. Immediately, many LECs responded with hostility and for nearly 2 hours refused to untable the issue. (Notes of that meeting are enclosed in appendix p.X to XX. It should be noted that since these notes are generated by Bellcore, they do not paint a very complete picture of the hostility and motivations of participants. However they should be sufficient to give an understanding of what will happen if the Commission delegates numbering decisions and dispute resolution.) -Issue was untabled after 2 hours because switch manufacturers agreed to research technical feasibility of \*\* on their switches. The ICCF refused to form a task group that would in good faith genuinely deal with the requested \*\* need. (Appendix Pages 4,5 &6)

-Before the following meeting, requestor sent a letter to all participants asking that if a technical solution to \*\* was available, it should support sending a letter to NANPA requesting that \*\* be listed as an available code. At the 3rd ICCF meeting, there was no consensus to send that letter and the forum refused to further facilitate any work on \*\*. The reader should keep this event in mind when it reads about the 1# code in next paragraph.

In 1993, the INC (under ICCF control) accepted an issue dealing with technical feasibility of access code 1# for an interexchange carrier. This short code is not the only similarity with the \*\* code. The issue statement request that the INC output a letter of recommendation to NANPA for the listing of 1# as an available access code. It is interesting to note that the ICCF was asked but refused to do the same for \*\*. It may claim that 1# if feasible would cut thru a pre-subscribed carrier. But that is besides the point. A provider should get fair access to numbering resources. Other inter-exchange may not wish to offer a like service behind 1#. Or this service may turn out to be exclusive such as the Lotus Notes deal AT&T made. The Commission must decide now to control numbering because this kind of inequity stands in conflict with the Commission's stated goals of new services and economic growth. (Appendix Page 7)

-While this ICCF work was under way, the requestor was also working with the IILC on technical assistance around its proposed service and the \*\* need. The IILC stripped the \*\* request from the more technical questions and implied that it would only work on \*\* if it were integrated into its issue 036 dealing with other abbreviated requests. (Appendix Page 8 & 9)

-For 2 years the \*\* request was discussed at the IILC and included in letters going to switch manufacturers. While the LEC co champion suggested that some switch manufacturers did not recommend \*\*, once he released the switch manufacturer letters, it became clear that their opposition was not technical: they were merely saying it was rare. This is an example of how even a supposedly open forum serves to distort information for anticompetitive reasons. The same LEC co-champion also inferred that \*\* would require presubscription. Not true. Examining the AT&T reply shows that they were merely saying a pre-subscribed version would be quicker to produce. The Commission should erase any belief that these forums can fairly address numbering issues.

-The task group of IILC issue 036 on abbreviated dialing agreed in the issue statement from day one to recommend preferred abbreviated dialing methods. After 2 years of work it failed to recommend any dialing methods. This shows how these forums will not serve the interests of ratepayers. The "task group" said as an explanation that it could not agree on which codes to recommend. However, when one looks at the Findings section of the closing document of issue 036, one sees that the task group saw #NXX, #XXX, NXX# and XXX# as the most desirable. If one looks carefully for any lengthy debate over multiple conference calls about why some parties favored a leading # sign or trailing # sign or debates leading to decide between 3 or 4 digit codes, they do not exist. They did not recommend codes because they have an interest not to. (Appendix Page 10)

-Adding injury to insult, the same task group who could allegedly not agree on recommending one or more of the above codes after 2 years actually recommended against the \*\* code for reasons which are not true! (Appendix page 11)

-The task group early in the process made a democratic decision to establish sub-groups having to do with (a) numbering issues (b) technical issues (c) policy issue. However, these task group were never kicked into work. There will be no decisions in the interest of new services and economic growth unless the Commission steps in. Such forums have minimal value, are not fair and are manipulated to harm the interests of smaller participants. The Commission needs to take an approach similar to what the FDA is now taking when it comes to matters revolving around smoking. The FDA is looking as to what will best serve the country and sure looks ready to let the tobacco companies know what is expected of them. A like approach in the area of technology would do this country a lot of good.

-I have vigorously opposed the closing of this issue as it stands today. I was advised by an ATIS representative that I should participate on an upcoming IAG call regarding issue 036. I requested from him a detailed conference call agenda citing a busy schedule. No response was provided. It turns out the call had to do with hearing complaints for procedural fairness if any before the IAG would approve the final document. I have also requested from ATIS copies and records of every IILC issue 036 task group. The ATIS representative initially declined that request and only provided some of the documentation while stating he "did not know if it was complete".(Appendix Page 12 )

-I have sent a similar request for records to Bellcore who took conference call notes for 2 years. Their representative said that she "could not find them". She later responded during a conference call that she was aware and had seen call notes dating to November 1992. When confronted with that discrepancy she explained that she had recently found them. An entity like Bellcore surely is well organized and would have adequate record keeping.(Appendix 13)

-The first draft of issue closing documents had a statement in the saying that abbreviated dialing was in the interests of LECs and ESPs. This was later changed to "in the interest of the Industry". Finally in it's final version it reads: "May be in the interest of the industry." (Appendix 14 & 15)

If the Commission is intent on facilitating new services, it will have to take an immediate leadership role. There seems to be a contradiction in LECs making such vague and tentative statements when yet they invest 2 years worth of their resources into the process. If they really doubted at all that it was in their interest, should they not refrain from participating? The Commission cannot allow or tolerate any time being wasted where underlying motivations seem to conflict with the interests of the ratepayers and emerging providers. If LECs use abbreviated dialing in their interest, it seems logical that it is in their interest to resell to new service providers an equal convenience while being a new source of revenue.

-Notes of the final session of ICCF dealing with \*\* tell the story of how little will get done unless the Commission takes over numbering.(Appendix pages 16,17 &18 )



### Conclusion

I respectfully request that the Commission weighs the above examples when it makes a decision about numbering administration or any other important technology related decision for that matter. I have been diligent and worked very hard with much resources. Above you see the result from working with "forums" and entities delegated this kind of decision making. This kind of "consensus" is not the one in the interest of the nation. Simply put, interested parties will be turned away, sent the wrong way, forced to counter untrue information or face issues only raised as delaying tactics. They will be represented that the issue is under study and a decision is on the way. They will be stuck in a process with no meaningful results, wasting precious resources. The simple will be made complicated, the important delayed to later. Simply put, I have difficulty finding will to deal with numbering at large in any of these forums. The process is manipulated and new entrants in the Information Superhighway become it's drive by shooting victims. The Commission must with courage reinvent it's approach so that it can lead the world successfully into a very exciting new era.

Respectfully Submitted,

Telacoess

By: 

Jan Masek

302 N. La Brea Ave #1000

Los Angeles Ca 90036

(213)936-4255

June 6, 1994

As I'm sure you can appreciate, carriers make their own decisions on what modifications and upgrades they will make to their facilities. You may wish to gauge their reaction to your proposals by bringing them to the Industry Carriers Compatibility Forum (ICCF), in which many of the exchange and interexchange carriers participate.

Please advise me of what further action you would like us to take in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ron Conner", followed by a horizontal line.

DISCUSSION OF THE PRINT GROUP REQUEST  
TO ACCEPT A NEW ISSUE RE: VERTICAL ACCESS CODE \*\*

Points Noted:

1. Jan Masek, Issue Originator, The Print Group, presented a request for acceptance of a new Issue re: establishing a vertical access code \*\*.
2. It was suggested that there is a technical limitation to inputting four 1's to represent \*\* in the rotary environment.
3. A question was raised whether there is the capability today to use a \*\* format, i.e. versus a \*\*\* format.
4. A question was raised whether application of a \*\* format is national in scope.
5. A question was raised whether there is already a process established in the ONA environment to evaluate a new capability.
6. It was suggested that \*\* is not a vertical service code and therefore may not be under the purview of the ICCF.
7. Jan Masek noted that he will also propose an Issue to IILC at their meeting tomorrow associated with establishing a \*\* capability.
8. It was suggested that use of the \*\* format in a local test market can be locally negotiated between the appropriate entities.
9. A concern was expressed that the \*\* capability may not be available behind a Centrex or PBX.
10. It was noted that any digits dialed after the \*\* would be sent directly to a processor.
11. It was noted that a LEC has assessed the call processing capability and feels that it is technically possible.

- ( 12. It was noted that the request for a vertical access code rather than a vertical service code has not been made before. )
- ( 13. It was suggested that the \*\* format is an access issue, not a numbering issue. )
14. A question was raised whether the desired service by the Print Group could be accessed via a 7-digit number.
- It was stated that access via a 7-digit number is not the desired format.
15. It was noted that there is not Industry agreement that \*XXX is the appropriate format for vertical service codes that must have the same meaning across more than one network on a given call.
- ( 16. It was suggested that The Print Group's desired resolution date has a bearing on acceptance of the Issue by the ICCF. )
- ( 17. It was suggested that more information than is now available due to proprietary concerns must be made available before ICCF could work this Issue. )
- It was noted that there is an Industry process in the standards arena for disclosure of patent information.
- ( 18. It was suggested that the associated IILC Issue re: abbreviated dialing should be resolved before allocation of numbering resources to this Issue's requested \*\* capability can be determined. )
- ( 19. It was noted that agreement was reached at ICCF25 that Issues must be clearly and comprehensively defined before being accepted at ICCF, in order to most effectively address the Issues accepted in a timely manner. )
20. It was suggested by NANPA that the N11 functionality may be best suited to The Print Group's request.
21. It was suggested that ICCF has not historically assigned access codes.

- 3 -

- ( 22. It was suggested that ICCF accept this Issue, and table it pending resolution of the associated IILC issue. )

Agreement Reached:

1. The Print Group Issue re: \*\* capability was accepted, and will be **Tabled.**

IILC LIAISON REPORTPoints Noted:

1. Jan Masek, The Print Group, gave the IILC Liaison Report.
2. Jan reviewed the status of IILC Issues #036 and 037, which are related to ICCF Issue #246, "ESP/The Print Group Request Vertical Access Code \*\* In Conjunction With Existing ONA Filing."
3. Jan Masek, Issue Originator of Issue #246, requested that the status of Issue 246 be changed from 'Tabled' to 'Active' due to the recent successful laboratory testing of its service with an involved LEC.
4. Jan distributed a revised Issue Statement for Issue #246.
5. Jan indicated that Issue #246 requests a feasibility assessment of \*\* as a Vertical Access Code (i.e. not followed by any numeric value) and that it be capable of being translated to a 7 digit POTS number by the public network, which number would direct calls to The Print Group's network.
6. A concern was expressed that ICCF participants may not be able to guarantee that if \*\* were implemented as a vertical access code, that code would be used to direct traffic exclusively to The Print Group's network.
7. NANPA indicated that the Vertical Service Code Guidelines do not include the \*\* format as a vertical service code.
8. It was noted that Issue #246 was tabled at ICCF26 pending resolution of the associated IILC Issues.
9. It was suggested that vertical service codes are currently used to direct traffic within a network, not as network identifiers to direct traffic to specific networks.
10. Jan indicated that the focus of the IILC work on this issue is the utilization of intelligent network components to provide the \*\* capability requested by The Print Group.
11. It was suggested that the \*\* format is most similar to an abbreviated dialing code, rather than a vertical access code.
12. Jan indicated that The Print Group's service would bill the associated calls to the recipients of those calls.
13. It was suggested that an IC Report may be appropriate to gather the requested information on switch/system technical capabilities re: the \*\* format.

14. It was suggested that the lack of vertical access code assignment guidelines should not preclude the assignment of \*\* by NANPA.
15. A question was raised as to whether \*\* is a format that is currently under the administrative jurisdiction of the NANPA numbering resources.
16. NANPA stated that it is not the allocator of the \*\* resource.
17. A concern was expressed re: the application of \*\* being limited to one service provider.
18. Jan indicated that The Print Group feels that it is as entitled to the \*\* vertical access code as any other service provider, using the FCC mandate for equal access as a key reason.
19. It was suggested that translation of \*\* to a 7 digit number is very similar to shared speed dialing service today, i.e. that shared speed dialing might be an alternative to the use of \*\*.
20. It was suggested that an access arrangement for a single entity is contrary to what the Industry at ICCF has historically addressed, i.e. there may be other entities in the future who will request access to the \*\* format.
21. It was suggested that the proposed revisions to Issue #246 make the Issue a request for a new access method, which is not consistent with LEC equal access obligations or ONA obligations.
22. MCI indicated that it supports the acceptance of the revised Issue #246 Issue Statement.
23. It was suggested that the ICCF vendor participants may be able to provide information as to the degree and extent of switch development required to implement \*\* as an access arrangement in terms of translating it to a 7 digit number.
24. It was suggested that The Print Group could access the appropriate switch vendors directly.
25. A question was raised as to whether \*\* would be accessible from a cellular switch, as well as after cut-through to an IC.
26. The Print Group intent is that \*\* would be accessible from a cellular switch, as well as after cut-through to an IC.
27. MCI indicated that it would not be able to provide any information on its network in a public forum, but would be happy to work with The Print Group on a one-on-one basis to provide this information.

28. Bell Atlantic indicated that MCI's suggestion re: a one-on-one approach may be the most appropriate way to answer The Print Group's request.
29. Jan Masek indicated that The Print Group strongly disagrees with Points Noted #26 and 27 re: the one-on-one approach to answer its request.
30. It was suggested again that The Print Group's request is already being worked in the IILC, and that the ICCF should leave Issue #246 tabled, until the IILC work is completed.
31. TRG indicated that it cannot provide specific switch by switch information due to vendor proprietary constraints, i.e. that it can only provide general information re: TRG switches' capability associated with the \*\* format.
32. AT&T Network Systems and NTI indicated that they are willing to provide a Report at ICCF28 re: the technical feasibility and general timeframes associated with the \*\* capability.

Agreements Reached:

1. The proposed revisions to Issue #246 were accepted and the status of it will be changed from 'Tabled' to 'Active'.
2. The ICCF vendor participants will provide a Report at ICCF28 re: the technical feasibility and general timeframes associated with the \*\* capability.
3. Jan Masek will contact the Siemens and Ericsson vendors directly.
4. Any Report that is provided should include all classes of service within the appropriate switch, and should reflect the \*\* capability associated with a 7 digit local number within the local dialing area.

**INDUSTRY NUMBERING COMMITTEE (INC) ISSUE IDENTIFICATION FORM**  
**ISSUE TITLE:**  
**Abbreviated Dialing for Access Cut-Through to the**  
**Presubscribed Carrier**

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\*ISSUE ORIGINATOR: R. Hirsch  
\*COMPANY: AT&T  
\*TELEPHONE #: 908-234-4197  
\*REQUESTED RESOLUTION DATE:  
(optional)

ISSUE #: 025  
DATE SUBMITTED: 12/10/93  
DATE ACCEPTED: 12/10/93  
WORKSHOP ASSIGNED: Dialing Plan  
CURRENT STATUS: Active  
RESOLUTION DATE:

\*1. **ISSUE STATEMENT:** There is a need for an abbreviated dialing arrangement which will allow a calling party, served by an equal access end office, to be instantly cut through to the network of the carrier presubscribed to the calling line. This capability will permit the carrier to offer unique services such as, for example, services which require the use of a numbering plan other than the NANP. The currently available feature, the use of a 5 digit access code (10XXX#), and especially the future 7 digit code (101XXXX#), although usable for this purpose, are known to be an impediment to widespread user acceptance. Accordingly, an access arrangement that requires fewer dialed digits is necessary.

→ \*2. **SUGGESTED RESOLUTION OR OUTPUT/SERVICE DESIRED:** A workshop should be established to study the technical feasibility of an abbreviated access code for cut-through to the calling line's presubscribed carrier. The access code should consist of as few characters as possible, preferably no more than three. Examples might include #, 1#, 10#. After studying all possible arrangements and examining potential conflicts with existing dialing codes, as well as the ease or difficulty of development and deployment of each of the proposed arrangements, the workshop should recommend a dialed access code for this purpose, and present that recommendation to the NANP Administrator.

\*3. **OTHER IMPACTS** (if any):

4. **CURRENT ACTIVITY:** *Met at INC4 with a presentation by IILC on the current status for their Issue 036 (Abbreviated Dialing). Future direction of the liaison needs with IILC and Workshop efforts to be developed in the work plan. Next meeting at INC5.*

Co-Chairs: SWBT - Vickie Gorman-Page/Beth Rice  
U S WEST - Leila Gibson

5. **RESOLUTION:**

UPDATED: 3/1/94

\* To be filled in by Originator



Issue #041P - User-Dialed Digits in FGD Format

A revised issue statement will be presented for IILC acceptance at the July meeting.

IV. July 13-14, 1993 IILC Meeting

The proposed agenda for the July 13-14, 1993, IILC meeting was reviewed and the following changes made:

- There will be an additional "Special Presentation" made by Northern Telecom, entitled *ONA Services Implications of Operator Services*;
- Bill Klein was asked to include a discussion of the recently announced expansion of the ECSA membership during his presentation on activities in other industry forums;
- Discussion of Issue #035 will now take place under "Active Issues Reports";
- An agenda item will be added under "Calendar Review" to discuss the 1994 IILC calendar. The Secretary will prepare viewgraphs to facilitate this discussion.

New participant "Greeters" for this meeting will be Byron Biddle of Dial Page and John Feneck of NYNEX-TRG.

V. Other Business

Need to Request Re-examination of the ICCF Resolution of "\*\*\*\*"

The question was raised if it was necessary that the IILC request the Industry Carriers Compatibility Forum (ICCF) to re-examine its resolution of the "\*\*\*\*" issue in light of the expressed dissatisfaction of the issue originator who has also presented a companion issue to the IILC. Don Radovich reported that he has spoken with representatives from the ICCF and the Carrier Liaison Committee (CLC), the oversight group for the ICCF, and they believe that the issue was dealt with fairly. Furthermore, these forums have avenues which individuals can pursue should they feel they have not received equitable treatment. No such action has been taken to date. The IAG agreed that any further action in this matter should be initiated by the issue originator, not the IILC.

After some discussion it was tentatively agreed that should this resolution be adopted by the CLC, the transfer of any current or future issues from the IILC to the INC would be addressed much the same as they are now: if it is felt that an issue can be more appropriately addressed in the IILC, it will be; if it is felt that another forum is more appropriate, the issue will be forwarded.

- Feasibility Assessment of \*\* (ICCF) - the ICCF agreed at its March 10-11, 1993 meeting that this issue, as provided by the issue originator, was resolved. However, there was no agreement to the request that the NANPA list \*\* as a vertical service code.
- Assignment of 555-XXXX Line Numbers (ICCF) - the purpose of this issue is to determine the feasibility/desirability of using 555-XXXX line numbers and to develop guidelines for assignment. Kelly Daniels of Telco Planning, co-leader of the issue at the ICCF, spoke briefly on task group activities.
- New Committees at ECSA - ECSA has agreed to sponsor the following new committees:

"Electronic Communications Service Provider Committee" - this committee has been established as an open, yet secure, forum between the telecommunications industry and law enforcement representatives to identify those technical issues related to lawfully-authorized electronic surveillance and to develop resolutions to such issues for voluntary implementation by the industry. An announcement will be made regarding the initial meeting of this group.

"ECSA Network Reliability Steering Committee" - the Network Reliability Council has requested that ECSA assume responsibility for the ongoing collection and macro-analysis of data associated with FCC reportable network outages. The initial organizational meeting of this Committee will take place May 27, 1993.

#### V. Issue Specific Discussions

Moderated by Ralph Guenther of IBM and Don Radovich of U S WEST, co-chairmen of the Interindustry Advisory Group (IAG).

## IILC ISSUE IDENTIFICATION FORM

Issue Title: Local Calling Area  
Abbreviated Dialing Access  
To Information and Enhanced  
Services

ISSUE # 036  
DATE SUBMITTED 4/23/92  
CURRENT AS OF DATE 11/17/92  
IAG REVIEW DATE  
IILC ADOPTION DATE

## 1. DESCRIPTION OF REQUESTED SERVICE:

Enhanced Service Providers (ESPs) have requested local calling and abbreviated dialing access to their enhanced or information services utilizing less than the seven digits required by the North American Numbering Plan Administration (NANPA) and BOC Notes on the LEC Networks - 1990. Requesters have asked for various dialed combinations including three digit access (N11, NXX), tone pad symbol codes (\*XX, \*\*), and possibly other code combinations.

## 2. SUGGESTED RESOLUTION OR OUTPUT:

- a) Identify and describe the ESP's functional network requirements.
- b) Identify critical technical and operational issues.
- c) Identify relevant public policy issues.
- d) Establish appropriate network technical standards liaisons.
- e) Identify appropriate in-place and/or planned network technical options.
- f) Develop a process for addressing identified issues.
- g) Recommend preferred dialing method(s) for switch vendors to develop.

## 3. OTHER IMPACTS:

## 4. ISSUE CO-CHAMPION/ORIGINATOR:

Name: Walt Weyand  
Company: BellSouth Telecommunications  
Address: 29A51 SBC  
675 W. Peachtree St.  
Atlanta, GA 30375

Telephone: (404) 529-5305  
Fax: (404) 529-7074

## ISSUE CO-CHAMPION:

Jim McKnight  
Cox Newspapers  
1400 Lake Hearn Drive  
Atlanta, GA 30319

(404) 843-7936  
(404) 843-7928

## 5. FINAL RESOLUTION

Recommendations

The IILC recommends that:

1. none of the abbreviated dialing arrangements investigated be considered as viable alternatives to existing dialing arrangements in the LEC networks by interested parties without full consideration of the FCC's four criteria for ONA Services: Technical Feasibility, Costing Feasibility, Utility, and Demand.
2. the Vendor Response Matrix (see Section 5) provides a switch-by-switch analysis of eighteen abbreviated dialing formats either requested by ESPs or determined by the Task Group to meet the needs identified in the issue statement. Each LEC should use the vendor matrix as a starting point to determine the feasibility of abbreviated dialing in its serving area with the installed mix of switches.
3. this documentation be used as input into the AIN Release 1.0, subset 0.1 and 0.2 planning process so that AIN development may include the functionality necessary to provide the services defined by the ESPs in this proceeding.
4. a formal liaison be established with the Industry Carrier Compatibility Forum (ICCF) and the Industry Numbering Committee (INC) to share the information developed in this document and to encourage the development of industry standards for abbreviated dialing arrangements and their uses, to include the possibility of different dialing formats to differentiate pay-per-call from other abbreviated calls.
5. the \*\* dialing format requested by one ESP has been found to be technically feasible per the Vendor Response Matrix in section 5. The task group, however, determined that both this alternative and the similar ## were too limited in their availability and require pre-selection of ESPs by subscribers. The task group does not recommend adoption of either \*\* or ## as alternatives that meet the feasibility criteria agreed to by the members of the task group.
6. those who desire the functionality described in IILC Steps 1.00 and 2.00 of this document (see Section 5) use the information contained in this document as a guide when requesting this capability from individual Local Exchange Carriers. If the desired capability is not available from a specific LEC, this document could serve as the basis for a new service request.

This document represents a consensus  
of the Issue # 036 Task group and  
is subject to final approval by the IILC.

3/25/94 16:06:40

THE PRINT GROUP INC  
MAR-25-1994 17:13 FROM ATIS WASHINGTON DC USA TO

PAGE 1 OF 1  
12139364255 P.01

To: Jan Masek

From: Jeff Kushan

Date: March 25, 1994

Re: Your FAX message, 3/24/94

Dear Mr. Masek:

In regard to your request as to the "RESPONSIBLE SECRETARY", there is no answer. The IILC Bylaws describe, in Section IV, Paragraph 4.2, the TASK GROUP RESPONSIBILITIES. There is no requirement that minutes be kept. This section does define the requirement to develop findings, recommendations and resolutions. In the final issue documentation, there is a Summary of Proceedings, as well as copies of all the contributions. If notes or minutes are taken, it is the responsibility of the Task Group co-champions, to distribute those to the participants. As best as I can tell, this has been done, and you have been on distribution for them all.

If there is a specific set of documentation you are in doubt about, please identify it for the Task Group co-champions, or me. You have a copy of the closing documentation, which includes the Summary of Proceedings, and I have just sent you copies of all the documentation I have received from the Task Group. If there is a missing Task Group document, please identify it, and arrangements will be made to get it for you.

Please call me if you have additional questions.

NT BY:

3-22-94 : 4:01PM :

BELLCORE-

912139364255:# 1/ 1

TO: Jan Masck  
FROM Joan Cohen  
DATE March 22, 1994

SUBJECT Request for IILC Issue #036 Task Faxes.

Dear Jan:

I'm sorry there has been a misunderstanding about your request. Your fax of March 14, 1994 outlines a much more extensive undertaking than I first believed your original request to be.

I am not the secretary of this organization. In a spirit of cooperation I provided you copies of documents readily available in my files - a stack one inch thick.. Since responding to your request is not part of my duties or responsibilities, I regret that I simply cannot devote more time to this matter. Further more, my files date from January, 1993 when I joined the issue, well after its inception.

Secretarial support is the responsibility of ATIS. Since the IILC secretary has been on the task group list from the beginning and therefore, has received copies of all documents, as we discussed on the telephone yesterday, you should direct your request to Jeff Kushan, IILC Secretary.

cc: W. Weyand  
D. Radovich  
J. Kushan  
R. Toeling

IILC ISSUE ESPR-036  
LOCAL CALLING AREA ABBREVIATED DIALING  
ACCESS TO INFORMATION AND ENHANCED SERVICES

Findings and Recommendations

The Information Industry Liaison Committee (IILC) has investigated the Enhanced Service Provider (ESP) request described in IILC Issue # 036, Local Calling Area Abbreviated Dialing Access to Information and Enhanced Services.

Findings

The IILC finds that many ESPs desire:

1. a dialing arrangement of five or fewer digits or symbols (# or \*) so their customers will gain the benefits of dialing fewer digits while allowing the broadest number of service providers to be served.
2. that calls be delivered to them from the broadest customer base feasible without the need for ESP pre-selection by telecommunications subscribers.
3. that they a.) be provided service from the LECs on a tarified basis, b.) have the option of charging the end user to access the service, and c.) have the option of either LEC or ESP provided billing to their customers.
4. that the selected abbreviated dialing arrangement(s) give the caller an indication of whether the call is a "free call" or is "pay-per-call".

Further, the IILC finds that:

1. adoption of an abbreviated dialing format by Local Exchange Carriers (LECs) for access to information and enhanced services is in the best interests of the ESPs, Information Service Providers (ISPs), and LECs and their subscribers.
2. based on the vendor response matrix (see Section 5) developed by the task group four abbreviated dialing formats appear more feasible than others investigated by the task group. The formats that appear most feasible are #XXX, #XXXX, NXX#, and NXXX#, where # represents a symbol key on the telephone instrument, X represents digits 0 through 9, and N represents digits 2 through 9.

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The Information Industry Liaison Committee (IILC) has investigated the Enhanced Service Provider (ESP) request described in IILC Issue # 036, Local Calling Area Abbreviated Dialing Access to Information and Enhanced Services.

Findings

The IILC finds that many ESPs desire:

1. a dialing arrangement of five or fewer digits or symbols (# or \*) so their customers will gain the benefits of dialing fewer digits while allowing the broadest number of service providers to be served.
2. that calls be delivered to them from the broadest customer base feasible without the need for ESP pre-selection by telecommunications subscribers.
3. that they a.) be provided service from the Local Exchange Carriers (LECs) on a tariffed basis, b.) have the option of charging the end user to access the service, and c.) have the option of either LEC or ESP provided billing to their customers.
4. that the selected abbreviated dialing arrangement(s) give the caller an indication of whether the call is a "free call" or is "pay-per-call".

Further, the IILC finds that:

1. adoption of an abbreviated dialing format by LECs for access to information and enhanced services may be in the best interests of the industry.
2. based on the vendor response matrix (see Section 5) developed by the task group four abbreviated dialing formats appear more feasible than others investigated by the task group. The formats that appear most feasible are #XXX, #XXXX, NXX#, and NXXX#, where # represents a symbol key on the telephone instrument, X represents digits 0 through 9, and N represents digits 2 through 9.

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TECHNICAL FEASIBILITY & GENERAL TIMEFRAMES ASSOCIATED WITH \*\*  
CAPABILITY (ISSUE #246R1)

Points Noted:

1. Dennis Bykowski, AT&T, presented AT&T's Report re: the switch modifications that may be required associated with \*\* capability.
2. Dennis noted that the \* is hard-coded now for \*XX, and thus development would be required in both the 5ESS and the 1AESS switches to implement the \*\* capability. The development interval for this capability could be 12 to 18 months, once a business agreement has been reached.
3. Dave Bench, Northern Telecom, presented Northern Telecom's Report re: the \*\* capability of the DMS10 and DMS100.
4. Development would be required in the DMS100, similar to AT&T's 5ESS and 1AESS switches. NTI's normal interval for switch development work is 24 months.
5. The \*\* capability is definable today in the DMS10, in terms of translating \*\* to one number per switching office (i.e. not on a line by line basis).
6. Jan Masek, The Print Group, reviewed the responses he has received from other vendors re: \*\* capability.
7. It was noted that translation of \*\* on a line by line basis in the Ericsson switches is complex and may not be able to be viably done in today's environment.
8. CTIA noted that the vendor responses re: the \*\* capability do not include whether cellular switches could also route the \*\* code.
9. It was noted that multiple providers cannot have access to the \*\* code unless it can be translated on a line by line basis.
10. It was noted that NANPA has previously stated that it does not currently have administrative responsibility for codes such as \*\*.
11. NANPA noted that there are other bodies/fora that are currently addressing the broader abbreviated dialing issue, and that it would be uncomfortable acting on the \*\* request until the Industry has reached agreement on the appropriate solution to the abbreviated dialing issue.
12. It was suggested that it may be possible for The Print Group to do a market trial of the service associated with its \*\* request, but using instead an existing vertical service code.